

October 31, 2005

Chair Phil Isenberg and
Members of the Marine Life Protection Initiative
Blue Ribbon Task Force
c/o California Resources Agency
1416 9th Street #1311
Sacramento, CA 95814

**RE: Proposals for Marine Protected Areas in the Vicinity of Vandenberg
Air Force Base**

Dear Chair Isenberg and Members of the MLPA Blue Ribbon Task Force:

As members of the Central Coast Study Area Regional Stakeholder Group (RSG) for the Marine Life Protection Act (MLPA), we were surprised to receive last week's communication from MLPA Initiative staff recommending that the RSG not consider candidate concepts for new or modified marine protected areas (MPAs) in the vicinity of Vandenberg Air Force Base. We strongly disagree with this recommendation and urge that it be reconsidered.

Vandenberg Air Force Base covers approximately 40 miles of shoreline, or nearly 10% of the Central Coast Study Area. The area includes important and diverse habitats that support many important fish, invertebrate, seabird and marine mammal species, including several species of concern. Perhaps most importantly, the area between Point Sal and Point Conception provides the critical ecological linkage between California's southern and northern -marine ecosystems. As noted in the Master Plan Framework (MPF), the California Current and Southern California Counter-current meet at Point Conception, "creating a rich transition zone" (MPF p.5). Point Conception has also been recognized for decades as the dividing line between the Oregonian and Californian biogeographic provinces (MPF p.49). The area around Point Conception is therefore a critical focal point for marine conservation both because it is characterized by unique oceanographic and biologic conditions and because it serves as a transition zone with high species diversity. This area warrants serious consideration for improved protection as required by the MLPA.

The existing level of protection for marine resources and habitats in this important area is not adequate to meet the requirements of the MLPA or the Goals and Objectives adopted by the RSG and BRTF. Currently, the area contains only one small State Marine Reserve consisting mostly of sand that contains little in the way of habitat or species diversity. Vandenberg's safety zones cannot legitimately be considered "de facto" MPAs. The safety zones were not based on sound scientific guidelines or designed to achieve ecological goals. Nor are the management measures that apply to the safety zones consistent with the goals and objectives of the MLPA. Extensive fishing for a variety of species, using diverse gear types (including troll lines, nets, and even traps) occurs in

these areas. Accordingly, the safety zones simply do not serve the same purpose or provide the same ecological benefits of an MPA as prescribed in the MLPA.

Excluding the state waters in the Vandenberg area from consideration for new or modified MPAs significantly undermines the RSG's ability to perform our assigned task under the RSG Charter and is inconsistent with the fundamental principles of the MLPA, which requires that the state's MPAs be designed and managed as a network. We have every confidence that the State of California and the military can, working together, develop an approach to MPAs that will adequately address any specific concerns that the military may have in regards to potential impacts to Vandenberg operations. Vandenberg has a representative on the RSG who has participated to date in the discussions. We trust that he will be able to identify any specific operational problems caused by the existing Vandenberg State Marine Reserve and that such problems can be both remedied and avoided in the future.

We urge the state of California and the Department of Defense to work cooperatively to address any specific operational concerns of the military without sacrificing the intent of the MLPA or the high priority Californians place on ocean protection.

Sincerely,

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Friends of the Sea Otter

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